

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ACCESS 4 ALL, INC. and  
FELIX ESPOSITO,

Plaintiffs,

V.

**DELANCY CLINTON ASSOCIATES,  
L.P., a Pennsylvania Limited Partnership**

Defendant.

CIVIL ACTION NO.  
04-12347 (MAP)

AUGUST 17, 2005

### DEFENDANT'S STIPULATION TO EXTEND TIME

Defendant, DELANCY CLINTON ASSOCIATES respectfully requests this Court for a continuance to respond to Plaintiff's First Set of Interrogatories and Request for Production. Plaintiffs served its first set of discovery on or about July 22, 2005. Defendant respectfully requests a continuance of fifteen (15) days, up to and including September 9, 2005, to respond to Plaintiffs' discovery. Defendant is in good faith attempting to obtain the information requested by the Plaintiffs, but is unable to obtain all the information requested within the time allowed, and therefore requires additional time to respond properly. This is the first request for such an extension of time with respect to this discovery. Plaintiffs' attorney has no objection to this request.

DEFENDANT – DELANCY CLINTON  
ASSOCIATES, L. P.

By: 

Michael Colgan Harrington -

#BBO565144

[mharrington@murthalaw.com](mailto:mharrington@murthalaw.com)

Murtha Cullina LLP  
CityPlace I  
185 Asylum Street  
Hartford, Connecticut 06103-3469  
Telephone: (860) 240-6000  
Its Attorneys

ORDER

The Defendant's Stipulation to Extend Time, having been considered, is hereby  
ordered GRANTED / DENIED.

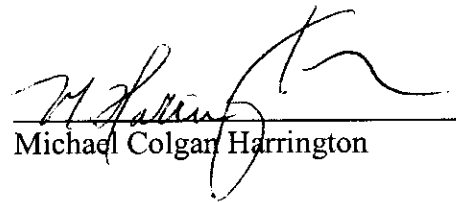
Date: \_\_\_\_\_

\_\_\_\_\_  
Judge/Assistant Clerk

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Defendant's Stipulation to Extend Time was mailed first-class, postage prepaid, on this 17<sup>th</sup> day of August, 2005 to:

Larry Fuller, Esq.  
O. Oliver Wragg, Esq.  
Fuller, Fuller and Associates, P.A.  
12000 Biscayne Boulevard, Suite 609  
North Miami, FL 33181



---

Michael Colgan Harrington

826094